

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	Case No. 19 CR 692
vs.	)	
	)	Honorable Robert Dow, Jr.
JESSICA NESBITT	)	

**DEFENDANT’S UNOPPOSED MOTION TO ENTER  
2452 W. AUGUSTA AS NEEDED FOR  
REDECORATING (AND POTENTIALLY) RENTAL  
PURPOSES WITH PRE-APPROVAL FROM PRETRIAL SERVICES**

NOW COMES Defendant JESSICA NESBITT, by and through her attorney, Sheppard Law Firm, P.C., and pursuant to Title 18, United States Code, Section 3142(c)(3), and moves this Honorable Court to modify her conditions of pretrial release to authorize her to enter her property at 2452 W. Augusta as needed, with pre-approval from Pretrial Services, to oversee the redecoration of the property and, potentially, the rental of the property. In support thereof, defendant states as follows:

1. Defendant has consulted with the government and Pretrial Services regarding this motion and there is no objection.
2. Currently, as a condition of bond, Ms. Nesbitt is only permitted to go to her property at 2452 W. Augusta Boulevard, Chicago, one time.
3. The parties and Pretrial Services have agreed that Ms. Nesbitt may redecorate the property to remove any fetish-related décor. Her goal is to redecorate the property so that it is rentable on AirBnB (and other like conventional rental sites).<sup>1</sup>

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<sup>1</sup> A separate motion will be filed regarding the defendant’s authority to rent out the property on AirBnB; this motion only pertains to her permission to enter the property to redecorate the property and potentially oversee rental of the property (in the event that the Court subsequently approves of such rentals).

WHEREFORE, defendant moves this Court to modify the conditions of her bond to permit her to enter the above-described property as needed to oversee the redecorating process – and potentially tend to the rental of the property – subject to pre-approval from Pretrial Services.

Respectfully submitted:

/s/ Adam Sheppard  
An Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that foregoing motion was served on July 15, 2020 in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Adam Sheppard  
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